

WESTERN MASSACHUSETTS ELECTRIC COMPANY

D.T.E. 03-88F

SECOND SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF
TELECOMMUNICATIONS AND ENERGY TO
WESTERN MASSACHUSETTS ELECTRIC COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Western Massachusetts Electric Company (“WMECo” or “Company”) the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how

the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary Cottrell, Secretary of the Department and with all parties; also submit two (2) copies of the responses to John J. Geary, Hearing Officer; one (1) copy of the responses to Sean Hanley, Assistant Director, Rates and Revenue Requirements Division; one (1) copy of the responses to Mauricio Diaz, Analyst, Rates and Revenue Requirements Division; and one (1) copy of the responses to Barry Perlmutter, Analyst, Electric Power Division.
8. All non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses are due by the close of business (5:00 p.m.) Monday, April 12, 2004.

INFORMATION REQUESTS

- DTE 2-1 For the years 2002, 2003, and 2004, please list the monthly costs (actual and projected) assessed to WMECo by the Independent System Operator - New England (“ISO-NE”) associated with the development, implementation, and ongoing operation and administration of New-England Generation Information System (“NE-GIS”). For each month, separate the costs into those associated with the Company’s standard offer service obligations and default service obligations.
- DTE 2-2 Has ISO-NE revised the method by which it allocates NE-GIS costs to NEPOOL participants during the period 2002-2004? If so, please describe these revisions and discuss how the revised method has affected the NE-GIS costs allocated to the Company.

- DTE 2-3 Is WMECo aware of any revisions the ISO-NE intends to make during the upcoming months regarding the method by which it allocates NE-GIS costs to NEPOOL participants? If so, please describe these upcoming revisions and discuss how the revisions will affect the Company. In particular, provide your best estimate of the monthly default service-related costs that the ISO-NE will assess to the Company under the revised allocation method.
- DTE 2-4 Please explain why WMECo has not included the NE-GIS costs associated with the Company's default service obligations (as identified in Information Requests DTE 2-1 through DTE 2-3 above) as a "direct retail cost" (defined in Procurement of Default Service, D.T.E. 02-40-B at 17 (2003) as a cost that a distribution company incurs strictly on behalf of its default service customers) to be included in the Company's default service rates.